



June 14, 2013

VIA E-MAIL AND FEDEX OVERNIGHT

Mr. Carl Edlund, P.E.
Director
Superfund Division
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Edlund.carl@epa.gov

Ms. Cynthia Brown
Removal Enforcement Coordinator
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Brown.cynthia@epa.gov

Mr. Edwin Quinones
Attorney
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Quinones.edwin@epa.gov

Re: Information Request regarding the U.S. Oil Recovery Superfund Site, Pasadena, Harris County, Texas

Dear Messrs. Edlund and Quinones and Ms. Brown:

The City of Pasadena Texas (the “**City**”), respectfully submits this response to the U.S. Environmental Protection Agency’s (“**EPA**”) March 12, 2013 Information Request regarding the City’s municipal waste water treatment operations at 200 N. Richey. The City’s response is timely pursuant to EPA’s April 23, 2013 letter granting the City an extension until June 14, 2013 to respond to EPA’s March 12 Information Request.

This response addresses the City’s municipal wastewater treatment operations at the Old Vince Bayou wastewater treatment plant (“**Old Vince**”) located at 200 N. Richey. The City’s operations at the Old Vince concluded in April 2004 and it was not until January 20, 2009 that the City transferred title in 200 N. Richey to the U.S. Oil Recovery.

City of Pasadena Response to Information Request Regarding the USOR Superfund Site

June 14, 2013

Page 2

The information contained in this Response has been obtained from the following individuals and sources:

Robin Green, P.E., Director of Public Works, City of Pasadena from April 2003 to the present

Bob Hunt, City of Pasadena

Daya Dayananda, Assistant Director of Public Works, City of Pasadena

Richard Neely, Assistant Project Manager, Severn Trent Services

Greg Jalowy, Former Chief Operator, Old Vince Bayou WWTP, Severn Trent Services

EPA's March 12 letter indicates that the City may have "potential liability at the U.S. Oil Recovery (USOR) Superfund Site," and that "EPA believes that the City of Pasadena may be liable under Section 107(a) of CERCLA with respect to the" USOR superfund site. Along with this response, the City believes that EPA would benefit from a meeting with City representatives to discuss the City's municipal wastewater facilities. We request that after EPA's review of this response, the City and its representatives meet with EPA to review the response and how the City may be of further assistance to EPA in the course of resolving this matter. Counsel to the City is currently working with counsel to EPA to schedule a date in early July for such a meeting.

Background

The Old Vince Bayou Wastewater Treatment Plant

On April 7, 2004, the City concluded all municipal wastewater treatment operations at the Old Vince Bayou wastewater treatment plant when the New Vince Bayou wastewater treatment plant was put in service. The Old Vince acquired its name from the Vince Bayou, which is adjacent to the plant. The Vince Bayou watershed is located in southeast Harris County. The Vince Bayou watershed covers about 16 square miles and includes two primary streams: Vince Bayou and Little Vince Bayou. The Old Vince is located within a 100-year flood zone.

The Old Vince began treating domestic wastewater generated in the City in 1944. All treatment of municipal wastes was conducted using biological processes and **not** chemical processes. At no time during its operations did the Old Vince receive chemical or industrial wastewater. Rather, industrial wastes in the City's jurisdiction were, and still are, conveyed to and treated by the nearby Gulf Coast Waste Disposal Authority's industrial wastewater plant.

The Old Vince's design and operations were standard for wastewater treatment facilities of its era, and it underwent numerous renovations during its 50 years of service. In its last configuration, construction on which was completed in approximately 1982, raw wastewater from the City collection system was conveyed to a wet well onsite at the Old Vince. From the wet well, wastewater was pumped to the Headworks, where a Bar Screen removed large debris and a Grit System removed sand and other forms of grit from the water. From there, wastewater was gravity fed to the Primary Clarifier where it was partially clarified. Flow from this clarifier

City of Pasadena Response to Information Request Regarding the USOR Superfund Site

June 14, 2013

Page 3

was gravity fed to the Trickling Filter, where further primary treatment was conducted on the wastewater. Flow from the trickling filter was sent to the Secondary Clarifier for further clarification. Flow from this clarifier was sent to the Aeration Basins for biological treatment. Flow from the Aeration Basins was sent to the Final Clarifiers, which, in turn, flowed to the Chlorine Contact Chamber where Chlorine gas was injected to disinfect the clarified water before it was discharged to the receiving stream. After disinfection and just prior to final discharge, the water was de-chlorinated with Sulfur Dioxide gas. For a time in the early 1990's, Sodium Bi-sulfite was used as the de-chlorinating agent before the use of Sulfur Dioxide gas.

Beginning March 1, 1994, the City contracted with Severn Trent Services to operate Old Vince on behalf of the City. Under the City's agreement, Severn Trent was responsible for all operations at Old Vince.

At all times during its operation, the City maintained any and all permits for operation of the Old Vince as may have been required under the State of Texas and federal environmental laws. At all times that the City owned the Old Vince and it was in operation, the City self-reported monthly to EPA discharge monitoring reports ("DMR") for the Old Vince. In addition to self-reporting the DMRs to EPA, the City prepared and self-reported to EPA quarterly bio monitoring reports and annual reports for the Old Vince.

The City was not required to operate a pre-treatment plan ("PTP") when it owned and operated the Old Vince as the City had not identified at the time any significant industrial users ("SIU") that discharged to the Old Vince. As such, during the time that USOR operated at 400 N. Richey and 200 N. Richey the Texas Commission on Environmental Quality ("TCEQ") was at all times the control authority and not the City. As control authority, the TCEQ was the only authority responsible for enforcement of State and federal environmental laws concerning USOR. It was not until May 22, 2013, when the City's PTP was approved, that the City became vested with enforcement authority of State and federal environmental laws for industrial dischargers to POTW's subject to EPA's pretreatment regulations that operate within the boundaries of the City.

Availability of Records for the Old Vince Bayou Wastewater Treatment Plant

The Old Vince was decommissioned in April 2004. Almost all of the City's records related to the Old Vince have been destroyed since the plant was decommissioned. The City's record retention policy provides that records older than three-years may be destroyed, which is consistent with State and federal environmental law. Severn Trent has advised the City that its record retention policy also allows for records older than three-years to be destroyed and that almost all of its Old Vince records have been destroyed. The City and Severn Trent are aware of only the following Old Vince records that remain in existence:

- 1) a few maintenance work orders;
- 2) the last TPDES permit issued for the Old Vince;
- 3) limited records relating to exceedances under the TPDES permit; and

City of Pasadena Response to Information Request Regarding the USOR Superfund Site

June 14, 2013

Page 4

- 4) the City's Ordinance approving the sale of 200 N. Richey to USOR and related documents.

Records that existed at the time that Old Vince was decommissioned were transferred to the City's offices located at 901 Curtis Avenue, a secure building under the exclusive control of the City. In 2008, massive flooding and water damage caused by Hurricane Ike destroyed 901 Curtis Avenue. The roof of three-story City building caved in during the heavy wind exposing all of the contents of the building to rainwater that seeped through all the floors. The flooding from Hurricane Ike was so significant that there was three inches of water on the third floor of the City's building. Due to a lack of outside ventilation, mold set in throughout the City building within a week and destroyed all the documents in the building and the building itself. The City building had to be gutted out within just a few weeks after Hurricane Ike.

Sale of 200 N. Richey to USOR

By Ordinance No. 2008-296 adopted November 18, 2008 by the City Council of the City of Pasadena, the City approved the sale of 200 N. Richey to USOR. *See* Attachment A. By Deed Without Warranty dated January 20, 2009, title in 200 N. Richey transferred from the City to USOR. *See* Attachment B. From the time it was decommissioned in April 2004 until USOR took possession of 200 N. Richey sometime after January 20, 2009, the Old Vince was vacant with no operations conducted at the site.

Prior to acquiring 200 N. Richey, USOR had operations at 400 N. Richey. While 400 N. Richey is part of the superfund site identified by EPA in this matter, the City has never owned or had any operations at 400 N. Richey. Accordingly, all of the City's responses below pertain solely to the City's operations at 200 N. Richey.

Response To EPA's Information Request

1. What chemicals did you have, use, or store on site?

Information for the following response was provided by Messrs. Neely, Jalowy and Hunt.

In the course of Severn Trent's management of the Old Vince it utilized the following chemicals:

- Chlorine (CL2) as a gas used for disinfection in the wastewater treatment process. An average of six cylinders of CL2 was used every two to four weeks at the Old Vince. Each cylinder was 2,000 pounds each.
- Sulfur Dioxide (SO2) as a gas used for de-chlorination in the treatment process. An average of four cylinders of SO2 was used every two to four weeks at the Old Vince. Each cylinder was 2,000 pounds each.
- Polymer, (Zetag 8818), as a liquid used for sludge dewatering process. An average of four drums was used every two to four weeks at the Old Vince. Each drum was 55 gallons.

- Potassium Chloride (KCl), for dissolved oxygen probe electrolyte, lab testing average 5 oz.
- Diethyl-p-phenylenediamine (DPD), chlorine residual lab testing reagent. An average of 100 grams was used every four weeks. Approximately 1 gram of DPD was used four times a day for testing.
- Sodium Hypochlorite (HTH), granular used for algae eradication in clarifiers. An average of 100 lbs. was used on an as needed basis.
- Sodium Bi-sulfite, used in process for de-chlorination. An average of 2,000 gallons was used weekly.
- Oil based paint, used for equipment maintenance at the Old Vince was used on an as needed basis. The paint came in 10 gallon containers.

The amounts disclosed above are based on Mr. Greg Jalowy's recollection of how much material was purchased.

2. What solvents did you have, use, or store on site?

Information for the following response was provided by Messrs. Neely, Jalowy and Hunt.

Paint thinner was kept at the Old Vince and used in plant equipment maintenance. Typically, the paint thinner was available in 5 gallon containers.

3. Was the City of Pasadena a chemical waste water treatment plant?

Information for the following response was provided by Messrs. Neely and Hunt.

No. Until transfer of title to USOR in January 2009, the Old Vince was always a publicly owned domestic sewage treatment plant. As noted in the introduction, all treatment of municipal wastes at the Old Vince was conducted using biological processes not chemical processes. The plant was permitted by the State of Texas under TNRCC permit # WQ0010053-005 as a POTW for treatment of domestic sewage.

4. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing, or otherwise handling hazardous substances or materials at the Site.

Information for the following response was provided by Messrs. Neely and Hunt.

As a domestic wastewater treatment plant, the Old Vince received domestic wastewater from the City's collection system lines for treatment. The City did not receive waste through dedicated pipeline nor did it ever receive trucked waste for treatment. As such, during the City's operations of the Old Vince it never knowingly treated or processed hazardous substances at the plant.

In the course of treating normal domestic wastewater hazardous substances, as described in Item 5 below, were used. However, the concentrations of the chemicals used were not hazardous and were within the permitted and recommended range of application. As such, the levels of these chemicals that may have been present in the processed water were at or below EPA's human health standards for the chemical in question. The activities associated with receiving process chlorination gas, process de-chlorination gas and process sludge dewatering polymer were conducted pursuant to the standard practices and training employed by Texas certified wastewater treatment plant operators. All Severn Trent employees on-site at the Old Vince were trained and certified in health and safety standards and the proper handling of all chemicals and solvents used at the Old Vince.

- 5. Describe the chemical composition, characteristics, physical state (e/g/, solid, liquid) of each hazardous substance so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled at the Site.**

Information for the following response was provided by Messrs. Neely and Hunt.

- a. CL2 is a gas and was used as a disinfectant at the Old Vince.
- b. HTH is a solid that was used for maintenance operations at the Old Vince.
- c. Sodium Bi-sulfite is a liquid and was used in the process for de-chlorination.
- d. DPD is a solid used to test for chlorine residual testing.
- e. Zetag 8818, a polymer as a liquid used for sludge dewatering process. A copy of the Material Safety Data Sheet for Zetag 8818 is enclosed with this letter. See Attachment C.
- f. Sulfur Dioxide (SO₂) as a gas used for de-chlorination in the treatment process.

- 6. Was there a city maintenance yard on site?**

Information for the following response was provided by Messrs. Neely and Green.

No. At the Old Vince there was only a small maintenance shop attached to the plant office building. The shop was used for minor repairs of plant equipment.

- 7. Did the City of Pasadena burn sludge on site?**

Information for the following response was provided by Messrs. Neely and Hunt.

No. Incineration of sludge was not performed. Early in the Old Vince's operations, sludge was dewatered in drying beds. After some renovations at the Old Vince, the sludge was dewatered with belt press equipment and then hauled to a permitted landfill.

- 8. What industrial cleaning products were maintained/used on site?**

Information for the following response was provided by Messrs. Neely and Hunt.

The only cleaning products used at the Old Vince were normal household cleaning products for the cleaning of windows, floors, bathrooms and other common areas. Additionally, a degreaser was used to clean the housing on the pumps.

- 9. Did the waste water treatment plant warehouse anything for the City of Pasadena on site?**

Information for the following response was provided by Mr. Neely.

No.

- 10. Was the waste water treatment plant considered a recycling center for the City of Pasadena?**

Information for the following response was provided by Messrs. Neely and Green.

No.

- 11. Describe the treatment facility, primary, secondary, and tertiary, and explain the treatment process from intake to outfall.**

Information for the following response was provided by Mr. Neely.

The Old Vince was a pure oxygen activated sludge plant. Oxygen was pumped directly from the nearby Praxair oxygen generation plant into aeration basins via a pipeline. Two onsite blowers oxygenated and mixed two sludge holding tanks on either side of the aeration basins. Based upon the recollection of Mr. Neely, below is a description of the treatment facility, primary, secondary, and tertiary and the treatment process from intake to outfall.

Process Wastewater Process Description

Flow would pass through a bar screen at headworks, then to a primary clarifier, then to a trickling filter, then to a secondary clarifier, then to aeration basins, then to final clarifiers. From the final clarifiers the effluent would pass through a polishing filter (i.e. sand filter), and from there to a chlorine contact basin for disinfection (CL2), and de-chlorination (SO2), then to outfall to the Vince Bayou. Some of the waste activated sludge from the final clarifiers would be returned to the aeration basins. The remaining sludge from the final clarifiers was sent to the drying beds (old sludge system)/ belt press (new sludge system).

Sludge process description.

Waste activated sludge was received from the final clarifiers and dewatered with the drying beds (old sludge system)/ belt press (new sludge system). Dewatered sludge was hauled to a permitted landfill. The filtrate liquid from the drying beds and or belt press was returned by pipeline to the influent to the plant.

As explained on page 3 of this Response, neither the City nor Severn Trent have any records that show the process flow diagram or a site plan for the Old Vince.

- 12. What chemicals were used in the business/industrial process that created the waste stream?**

Information for the following response was provided by Messrs. Neely and Hunt.

The chemicals identified below that were used in the business/industrial process that created the waste stream are ones required by the State of Texas issued wastewater operating permit for the Old Vince to treat and meet effluent discharge requirements for a domestic wastewater treatment plant.

CL2 (effluent disinfection)
SO₂ (effluent de-chlorination)
Zetag 8818 (sludge dewatering).

- 13. Please provide a waste profile for each hazardous waste or Class I waste stream.**

Information for the following response was provided by Mr. Neely.

No hazardous waste was ever produced by the Old Vince. At no time was there ever a Class I waste stream produced from the Old Vince.

- 14. Provide all waste codes for each waste stream.**

Information for the following response was provided by Mr. Neely.

No hazardous wastes were created or present at the Old Vince, therefore there are no waste stream codes to identify.

- 15. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning the Site during the period that you owned the Site. Provide copies of all documents associated with such an occurrence.**

Information for the following response was provided by Messrs. Neely, Hunt and Green.

On May 15, 2003 the Harris County Texas Public Health and Environmental Services Pollution Control Division (“**Harris County**”) issued to the City a Violation Notice for the presence of chlorine after dechlorination in the amount of 0.28 mg/l, which was in excess of the permitted maximum limit of 0.10 mg/l. *See* Attachment D. On June 11, 2003, Severn Trent responded to Harris County with the corrective action taken to address the issue noted in the May 15, 2003 Violation Notice. *See* Attachment D at p. 3. No other corrective action was required by Harris County, nor was any other correspondence received from the County concerning this matter.

On October 22, 2003, the City received a notice of violation from the TCEQ for exceedances of the limitations set forth in the City’s discharge permit for the Old Vince. The exceedances were determined by the TCEQ during a record review conducted on July 7, 2003. On May 11, 2005, the TCEQ entered into an Agreed Order with the City for these exceedances. *See* Attachment E. The exceedances noted in the record review were as follows:

- 1 exceedance between April 2002 and July 2003 of the TSS Daily Average
- 5 exceedances between April 2002 and July 2003 of the TSS Daily Maximum
- 6 exceedances between April 2002 and July 2003 of the NH3-N Daily Average of 292 lbs/day
- 6 exceedances between April 2002 and July 2003 of the NH3-N Daily Average of 5 mg/L
- 6 exceedances between April 2002 and July 2003 of the NH3-N Daily Maximum
- 2 exceedances between April 2002 and July 2003 of the CBOD Daily Average of 584 lbs/day
- 1 exceedance between April 2002 and July 2003 of the CBOD Daily Average of 10 mg/L
- 5 exceedances between April 2002 and July 2003 of the CBOD Daily Maximum
- 1 exceedance between April 2002 and July 2003 of the Total Residual Chlorine.

See Attachment E at p. 3.

Pursuant to the Agreed Order, the City, in lieu of paying the fine, agreed to implement a Supplemental Environmental Project (“**SEP**”). *See id.* at Sec. III.(1),(2). The \$234,500 penalty was offset with the condition that the City implement the SEP. *See id.* at Sec. III. (2). The Agreed Order terminated five years from its effective date of May 11, 2005 or upon the City’s compliance with the terms and conditions of the Order, including the completion of the SEP. The City completed the SEP on September 30, 2006 and the Agreed Order terminated on November 21, 2006.

As explained on page 3 of this Response, neither the City nor Severn Trent have any other records that are responsive to this question.

- 16. Did the facility ever file a Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act (RCRA)? If so, provide a copy of such notification.**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

The City has no knowledge of any Hazardous Waste Activity Notification ever being filed for the Old Vince. The City has inquired of Severn Trent whether it has knowledge of the filing of a Notification and it does not.

- 17. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred at or from the Site.**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Neither the City nor Severn Trent have any knowledge of any leak, spill or release into the environment of any hazardous substance at the Old Vince. The Old Vince was a domestic wastewater treatment plant, and as such there may have been an occasional spill or release of domestic wastewater at the Old Vince. That wastewater would have contained normal background concentration contaminants, which may have included pollutants and/or contaminants.

As explained on page 3 of this Response, neither the City nor Severn Trent have any records that may provide additional information that would be responsive to this question.

- 18. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Site concerning insurance issues.**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

As explained on page 3 of this Response, neither the City nor Severn Trent have any records that may be responsive to this question.

- 19. Did any of the chemicals used in the business/industrial process contain any of the following hazardous substances: arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, benzene, chloroform, 1, 2-dichloroethane, methyl ethyl ketone, tetrachloroethylene, trichloroethylene, acetone, or hydrogen sulfide? If so, please identify which hazardous substance(s)**

was/were used. Also, please provide copies of any documents listing such hazardous substance(s) and how it and/or the chemical(s) were used in the operations at the Site, the purpose for such hazardous substance(s) and/or chemical(s) and how or if such hazardous substance(s) and/or chemical(s) were disposed of.

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Neither the City nor Severn Trent have any knowledge that any of the above hazardous substances were ever used at the Old Vince in the course of its operations. The Old Vince was operated as a domestic wastewater treatment plant. The only waste treated at the plant was domestic wastewater.

- 20. Did any of the chemicals used in the business/industrial process contain any other hazardous substances not listed above in Question 13? If so, please identify the hazardous substance(s) used. Also, please provide copies of any documents listing such hazardous substance(s) and how it and/or the chemical(s) were used in the operations at the Site, the purpose for such hazardous substance(s) and/or chemical(s) and how or if such hazardous substance(s) and/or chemical(s) were disposed of.**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Neither the City nor Severn Trent have any knowledge of any hazardous substances (other than the hazardous chemicals identified in response to Question No. 5) that were ever used at the Old Vince in the course of its operations. The Old Vince was operated as a domestic wastewater treatment plant. The only waste treated at the plant was domestic wastewater.

- 21. What chemicals/solvents/hazardous substances were received, accepted, processed/treated, by the waste water treatment plant intentionally or unintentionally?**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Neither the City nor Severn Trent have any knowledge of intentionally or unintentionally processing or treating any chemicals/solvents/hazardous substances at the Old Vince. The Old Vince was operated as a domestic wastewater treatment plant. The only waste treated at the plant was domestic wastewater.

Only CL2 and SO2 as a gas were used for treating domestic wastewater at the Old Vince, in accordance with standard practices for disinfection with chlorination and de-chlorination of the effluent. As noted in response to Question No. 5, some of the chemicals used in the course of treating domestic municipal waste are considered hazardous in the concentrations delivered but non-hazardous in the concentrations

introduced into the process and were within the permitted and recommended range of application. As such, the levels of these chemicals that may have been present in the processed water were at or below EPA's human health standards for the chemical in question.

- 22. Was the waste water treatment plant shut down due to unintentional acceptance of incompatible or inappropriate substances into the waste water treatment plant process? What were the substances and what was the source of each? How were the substances managed after the waste water treatment plant was shut down?**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

The Old Vince was never shut down due to unintentional acceptance of incompatible or inappropriate substances into the waste water treatment plant process.

- 23. What were the parameters of waste accepted at the waste water treatment plant?**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Only normal domestic wastewater was accepted at the Old Vince.

What did the waste water treatment plant process that was outside these parameters?

Neither the City nor Severn Trent have any knowledge of anything other than normal domestic wastewater ever being processed at the Old Vince.

What were the sources of these substances/wastes?

The source of the domestic wastewater processed at the Old Vince was the City's sanitary sewer collection system. Meaning that only domestic wastewater inflow that was within the design criteria of the plant was accepted. No other inflow into the plant occurred.

- 24. Were there any releases to the environment from any of the equipment on-site or off-site. Please provide details.**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

The Old Vince was a domestic wastewater treatment plant, and as such there may have been an occasional release of domestic wastewater at the Old Vince. That wastewater would have contained normal background concentration contaminants. As

explained on page 3 of this Response, neither the City nor Severn Trent have any records that describe or note specific releases to the environment from any of the equipment on-site or off-site at the Old Vince.

- 25. What were the acceptable wastes at the waste water treatment plant? How were the unacceptable wastes handled?**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

The only acceptable waste accepted at the Old Vince was domestic wastewater received through the City's sanitary sewer collection system. The Old Vince never accepted dedicated pipeline or trucked-in waste for treatment. Because the wastewater accepted in the Old Vince was brought to the plant through the City's domestic sanitary system, there would be no way to separate any unacceptable wastes from entering the Old Vince. However, the City and Severn Trent have no knowledge that any unacceptable wastes were transmitted through the City's domestic sanitary system into the Old Vince.

- 26. Please name all the generators who sent waste to the waste water treatment plant?**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Generator, as defined in the Information Request, means "persons who arranged for the disposal or treatment of hazardous substances at the [USOR] Superfund Site where the hazardous substances were released." As explained above, the City never owned, had operations on or conducted any activities at 400 N. Richey, which is defined by EPA to be part of the "Superfund Site." The City only conducted normal municipal wastewater operations at 200 N. Richey. Only users of the City's municipal collection system sent normal domestic wastewater to the Old Vince. The Old Vince never accepted from anyone hazardous substances for disposal or treatment. Nor did the City ever generate hazardous substances for disposal or treatment at the Old Vince.

- 27. Please provide the names and contact information, of former employees of the waste water treatment plant who might have knowledge of the day to day operations.**

The following current Severn Trent employees may have knowledge of the Old Vince operations as they were employed by the City at Old Vince prior to Severn Trent taking over operations at the plant.

Greg Jallowy
Brooks Bailey
Otis Nash

Rick Neely
Earl Goings

All can be reached at 713-477-5856.

The following are former employees of Severn Trent who may have knowledge of the Old Vince operations as they were employed at Old Vince. However, no known contact information exists for these individuals.

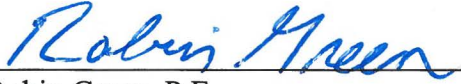
Mike Thoman
Billy Brooks
Walt Hunter
Richard Haynes

- 28. At the time of transfer from the City of Pasadena to U.S. Oil #2 what analytical data can you provide to support the conclusion that the substance remaining in the tanks at the 200 North Richey property was non-hazardous waste?**

Information for the following response was provided by Messrs. Neely, Green and Hunt.

Since the Old Vince was a domestic wastewater treatment plant treating domestic waste only, no hazardous substances would have been present in any tank on-site. At plant shutdown, all tanks and basins on the plant site were drained through a temporary pipe to the New Vince Bayou WWTP approximately 1 mile to the east. Afterwards, rainfall accumulation within the tanks and basins was pumped to the nearby West Pitts Lift Station; thence conveyed to the New Vince Bayou WWTP.

The information provided in this document is, to the best of my knowledge, true and accurate.



Robin Green, P.E.
Public Works Director
City of Pasadena